

To the Corporate Human Rights Benchmark and all other interested stakeholders

Vale understands that the Corporate Human Rights Benchmark (CHRB) is an important initiative to foster the improvement of practices adopted by companies to implement the UN Guiding Principles on Business and Human Rights.

In order to give further information on Vale's alignment to the UN Guiding Principles on Business and Human Rights, the company elaborated this document, which gives information of its practices regarding each CHRB indicator.

A. GOVERNANCE AND POLICIES

A.1. POLICY COMMITMENTS

A.1.1. Commitment to respect human rights

Vale is committed to implement the UN Guiding Principles on Business and Human Rights. As informed at our Human Rights Policy, the Guiding Principles are one of the references Vale uses to guide its practices.

Reference documents:

- Human Rights Policy (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/human-rights-policy.pdf>)
- 2014 Sustainability Report (page 25) (<http://www.vale.com/en/aboutvale/sustainability/links/linksdowndocuments/2014-sustainability-report.pdf>)

A.1.2. Commitment to respect labour rights

Additional information:

Vale Launched its Human Rights Policy in 2009, accordingly to the UN Business and Human Rights Framework and revised it in 2013, based on the UN Business and Human Rights Guiding Principles launched in 2011. The policy was a first step to the implementation of Vale's Human Rights Management System that is aligned with the 5 steps of the UN Guiding Principles: Policy; Assessment; Integration; Monitoring and Reporting; Grievance Mechanisms.

Our Suppliers' Code of Ethics and Conduct Supplier Code of Conduct is mandatory to all suppliers and requires to fulfill its Human Rights Policy and Human Rights Guide Vale, that describing the institutional commitment to the UN Global Compact. In this document, in addition to addressing the health and safety of workers as well as the three of the four ILO core labor standards: the elimination of forced or compulsory labor, the abolition of child labor, the elimination of discrimination in respect of employment and occupation .is the explicit guarantee of free association and collective bargaining

Our Suppliers' Code of Ethics and Conduct addresses the health and safety of workers as well as the three of the four ILO core labour standards: the elimination of forced or compulsory labour, the abolition of child labour, the elimination of discrimination in respect of employment and occupation. Vale commits to include both freedom of association and the effective recognition of the right to collective bargaining into the next revision of our Suppliers' Code of Ethics and Conduct which will take place before August 2016.

Reference documents:

- Human Rights Policy (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/human-rights-policy.pdf>)
- Human Rights Guide (<http://www.vale.com/EN/aboutvale/sustainability/Documents/human-rights-guide-03-12-2013.pdf>)
- Suppliers Code of Conduct (http://www.vale.com/pt/suppliers/code_conduct/documents/codigo-etica-conduta-fornecedor.pdf)

A.1.3. Commitment to respect human rights particularly relevant to the industry

Additional Information:

In commitment to ensure human rights, Vale submitted an application for participation in the Voluntary Principles on August 08th, 2016 and received a positive confirmation on PARTICIPATION, in November 1st, 2016

Vale's Sustainability Policy, submitted internally for approval by the Executive Board in May 2016, with final approval process in September 2016, addresses the rights of indigenous peoples, including procedure for free, prior and informed consultation.

From: Altschuller, Sarah
Sent: Tuesday, November 01, 2016 5:56 PM
To: Raquel Althoff (raquel.althoff@vale.com)
Cc: Luana Martins Andrade; Arnaldo Becher;
Subject: Vale's Application to the Voluntary Principles Initiative

Dear Raquel,

On behalf of the Voluntary Principles Secretariat, I am very pleased to inform you that the Plenary has approved the application of Vale to join the Voluntary Principles Initiative. Vale is now a Participant in the Corporate Pillar. Congratulations. I know that the application review took some time, and I thank you for your patience and goodwill through the process.

With that, here are a few practical/logistical matters to be aware of:

Orientation

I will be sending you information by email, but I expect that you and/or your colleagues may find it useful to schedule a call with the Secretariat so that we can provide you with a general orientation to the current work of the initiative. We can also discuss Vale's expected contribution to the initiative. Please let me know if you would like to schedule time for a conference call.

Administrative Matters

Public Materials - We will make the necessary updates to our public materials (including the website) in order to properly, and publicly, reflect the company's participation. Please let me know if you have any concerns about the timing of this.

Distribution Lists - The Secretariat maintains contact information for all members of the Plenary. Can you let us know whom from Vale should be added to the general Plenary distribution list? If you could provide names, titles, and contact information, that would be very helpful.

Website - The Voluntary Principles initiative maintains a password-protected website for use by Participants. The website includes a document library and a Participant Directory. Please let me know whom from Vale should be provided passwords to the site.



Governance

The Voluntary Principles Initiative has a Steering Committee consisting of representatives of all three Pillars (Governments, Companies, and NGOs). Current Steering Committee members include: the Government of Canada; the Government of the Netherlands; the Government of the United Kingdom; the Government of the United States; ExxonMobil; BP; Barrick Gold; Freeport McMoRan; International Alert; Partners for Democratic Change International; Fund for Peace; and LITE-Africa.

The Steering Committee, which meets on a monthly basis, is an executive body that is responsible for managing the affairs of the Voluntary Principles Initiative. That said, the primary decision making body is the Plenary (consisting of all Participants). The Steering Committee makes decisions in consultation with the Plenary. The Steering Committee is chaired each year by a member of the Government Pillar. This year's Government Chair is the Government of Canada. Canada, as Chair, will host the 2017 Annual Plenary Meeting, which will be held on March 2-3 in Ottawa.

If you have any questions or concerns that you would like the Steering Committee to consider, you should notify one of the Corporate Pillar representatives to the Committee. Alison Hills (alison.c.hills@exxonmobil.com) is the best person to contact, as she coordinates communications within the Corporate Pillar.

More information on governance can be found in the Governance Rules for the Voluntary Principles Initiative, available here: http://www.voluntaryprinciples.org/wp-content/uploads/2016/08/VPI-Governance_Rules_-_August_2016.pdf

Pillars

Each Pillar has its own monthly calls to discuss matters relevant to the Voluntary Principles Initiative. You should start to receive information about Corporate Pillar calls. If you do not begin to receive this information, you should notify Alison Hills.

Key Documents

As you and your colleagues familiarize yourselves with the Voluntary Principles Initiative, there are several key documents that you may wish to review. These include:

- *The Reporting Guidelines:* These guidelines set forth the expectations and requirements for Participants' annual reports. The Corporate Pillar guidelines are available here: <http://www.voluntaryprinciples.org/wp-content/uploads/2016/08/VPI-Corporate-Pillar-Reporting-Guidelines-July-2016.pdf>. As Vale is being admitted near the end of a calendar year, it will not be expected to submit a report this year.
- *The Roles and Responsibilities Documents:* These documents set out the core expectations for Participants in each Pillar. They are available at the following links:
 - Corporate Pillar: http://www.voluntaryprinciples.org/wp-content/uploads/2014/10/VPs_-_Roles_and_Responsibilities_-_Corporate_Pillar1.pdf
 - Government Pillar: http://www.voluntaryprinciples.org/wp-content/uploads/2014/10/VPs_-_Roles_and_Responsibilities_-_Government_Pillar.pdf
 - NGO Pillar: http://www.voluntaryprinciples.org/wp-content/uploads/2014/10/VPs_-_Roles_and_Responsibilities_-_NGO_Pillar.pdf
- *The Verification Frameworks:* These documents provide guidance on how Participants should seek to verify to one another that they are operating consistently with expectations established in the Roles and Responsibilities documents. They are available at the following links:
 - Corporate Pillar: http://www.voluntaryprinciples.org/wp-content/uploads/2015/05/Corporate-Pillar-Verification_Framework-May-2015.pdf
 - Government Pillar: <http://www.voluntaryprinciples.org/wp-content/uploads/2015/03/FOR-APPROVAL-Government-Pillar-Verification-Framework.pdf>
 - NGO Pillar: <http://www.voluntaryprinciples.org/wp-content/uploads/2015/05/NGO-Pillar-Verification-Framework-May-2015.pdf>

Please note that the Corporate Pillar Verification Framework includes an opt-in/opt-out provision. Implementation of the Framework is strongly encouraged, but not required.

Working Groups

There are currently two active Working Groups in the Voluntary Principles Initiative: the Implementation Working Group and the Governance Working Group. These groups were only recently launched. I will be emailing the Plenary regarding the planned activities of these groups in the next day or so and will include Vale in my communications.

Please note that Vale is free to join either Working Group. If you or your colleagues would like to be a member of a specific group, please let me know and we will add you to the appropriate email list.

Secretariat

The Secretariat is the primary administrative body for the Voluntary Principles Initiative. My colleagues and I support the work of the full Plenary, the Steering Committee, and the Government Chair. You can contact us at any time with questions or concerns related to the Voluntary Principles Initiative. You can also reach out to me directly or reach us at our general contact email (VoluntaryPrinciples@foleyhoag.com).

Secretariat members include Gare Smith (gsmith@foleyhoag.com), Sarah Altschuller (saltschuller@foleyhoag.com), Amy Lehr (alehr@foleyhoag.com), Isa Mirza (imirza@foleyhoag.com), Carol Kim (ckim@foleyhoag.com), and Barbara Mardambey (bmardambey@foleyhoag.com).

Voluntary Principles Association

Most of the work of the Voluntary Principles happens in the context of the Voluntary Principles Initiative, which is an unincorporated multi-stakeholder initiative. The Voluntary Principles Association was established in 2012 as a legal entity in order to meet certain administrative needs of the Initiative. With status as a legal entity, the Association can open a bank account, enter into contracts, etc.

All Participants in the Initiative are expected to become members of the Association. The Plenary's decision to admit Vale has granted the company admission to the Initiative, but, technically, formal admission to the Association will need to wait until the 2017 Annual Plenary Meeting. This delay will not have any practical impact on Vale's participation in the Initiative, and Vale will be treated as if it is already a member of the Association. If you would like to review the Articles of Association of the Voluntary Principles Association, please let me know and I will send you a copy for your reference.

Once again, congratulations, and please let me know if you have any questions or concerns.

All the best,

Sarah

Sarah A. Altschuller | Counsel

Foley Hoag LLP
Corporate Social Responsibility Practice
1717 K Street, N.W.
Washington, D.C. 20036-5342

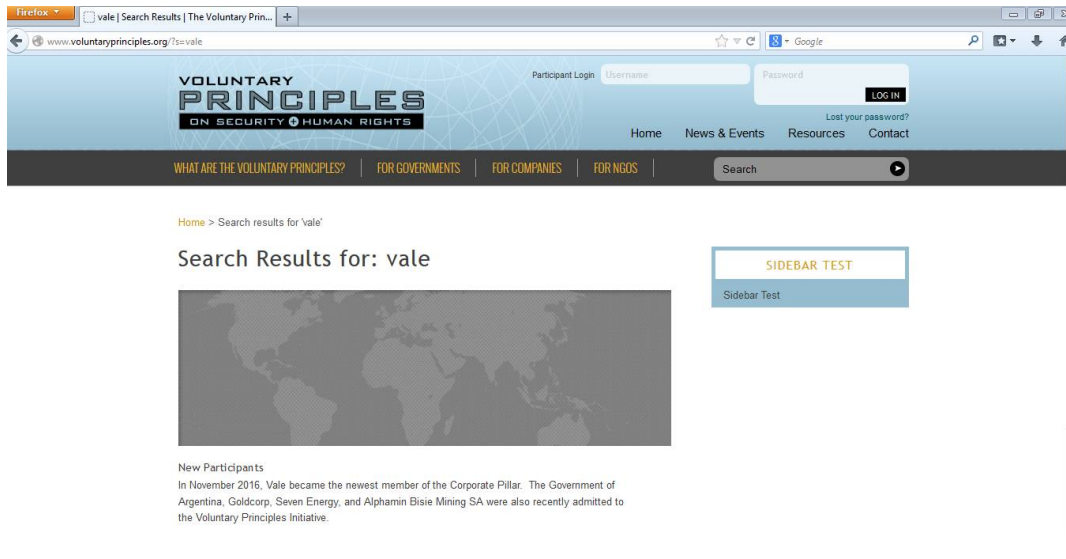
202 281 7387 phone

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Read the Corporate Social Responsibility and the Law blog at www.csr.and.the.law.com.

[Follow me on Twitter](#) [Connect with me on LinkedIn](#).



Its guidelines also establishes that:

- It respects and preserves the culture heritage, knowledge and practices of indigenous peoples within our influence area;
- It seeks to avoid situations where involuntary resettlement is required as a result of its projects and operations - and to work according to internationally recognized best practice standards to minimize the adverse impacts on affected communities where this cannot be avoided; being the IFC Performance Standards of International Finance Corporation the main reference in this case;
- It seeks to maintain a lasting engagement with communities and implement social, cultural, economic and environmental impacts management, and contribute to local sustainable development.

The right to water and sanitation is included into the commitment to implement impacts management.

Reference documents:

- Human Rights Policy
(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/human-rights-policy.pdf>)
- 2014 Sustainability Report (page 75)
(<http://www.vale.com/en/aboutvale/sustainability/links/linksdownloadsdocuments/2014-sustainability-report.pdf>)
- 2016 Sustainability Policy
- http://www.vale.com/pt/suppliers/code_conduct/documents/pol-0019-g%20-%20sustainability%20policy_rev%2000_e.pdf
- Voluntary Principles on Security and Human Rights
(<http://www.voluntaryprinciples.org/?s=vale>)

A.1.4. Commitment to engage with stakeholders

It is said at its Human Rights Policy that Vale seeks "to maintain a lasting engagement with communities" and at its Sustainable Development Policy that it is committed to "maintain open, transparent, structured and long term communication and dialog with stakeholders, respecting the culture and diversity of the regions where Vale operates, considering their interests in the company's management decisions."

Reference documents:

- Human Rights Policy
(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/human-rights-policy.pdf>)
- Sustainable Development Policy
(http://www.vale.com/en/suppliers/code_conduct/documents/sustainable%20development%20policy.pdf)

A.1.5. Commitment to remedy

Additional Information:

Vale developed tools and methodologies to assess risk and impact and manage human rights issues. In addition to the legal process of environmental licensing, which are conducted impact assessment studies and proposed measures for prevention, mitigation and compensation for any impacts, Vale also has a system for managing impacts on communities, called SDI (Stakeholder, Demands and Issues) which is operated by a team of professionals in community relations, in order to manage demand and enable the non-judicial referral and monitoring of judicialized cases. 2015 Sustainability Report: P. 55, 57, 58, More information can be found in item B.1.3.2015.

Vale commits to cooperate with the authorities in the investigation of any incidents involving allegations of disrespect of these rights along its production chain at its Human Rights Policy.

Reference documents:

- Human Rights Policy
(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/human-rights-policy.pdf>)
- 2015 Sustainability Report p. 55, 57 e 58

A.1.6. Respecting rights of human rights defenders

Additional information:

The Company does not tolerate threats, intimidation or physical attacks against no one representing the human rights cause such as human rights defenders and journalists. Besides that, Vale responds to any allegations through legal action (whenever applicable) and public positioning as link below.

Vale has a Human Rights Policy committing to respect human rights. Our commitment towards the respect for the community, community leaders and human rights defenders is reflected in the part: "Local, indigenous and traditional communities: we seek to maintain a detailed knowledge of territories where we operate or intend to operate. To maintain a lasting engagement with communities and implement social, cultural, economic and environmental impacts management, and contribute to local sustainable development also promoting community initiatives in education, culture, urban development and sports. We respect and preserve the culture heritage, knowledge and practices of indigenous peoples within our influence area. We promote human rights awareness-raising actions, with especial focus to the eradication of forced and child labor, in addition to promoting the rights of children and adolescents. This includes specific efforts to combat sexual exploitation of minors in the proximity of our projects under implementation and operations".

Moreover, we do have in our Code of Ethics and Conduct provisions that covers the rights and respect for Rights defenders: 1.4 Acting in strict accordance with all applicable laws, including anticorruption and anti-bribery laws, which apply to the operations of the company in the countries where it operates; 1.7. Being diligent and responsible in the relationships with authorities, customers, competitors, suppliers, community members and all other individuals, companies and organizations that the company works with in the course of its regular activities, always seeking to preserve the good reputation, image and relationships of the company; 1.13. Acting in accordance with social responsibility and respect for human dignity;

On the Code, there are also conducts that are considered unacceptable and subject to disciplinary measures: 2.2. Discriminating on the basis of ethnicity, national origin, gender, sexual orientation, religious belief, union affiliation, political or ideological beliefs, social class, condition with special needs, marital status or age; 2.3. Harassment of any kind, including sexual or moral, causing the embarrassment or discomfort of others.

Therefore, the illegal intimidation of Human Rights defenders is not allowed in the company. Whenever there are conflicts with community leaders and they act against the law, we seek the judiciary/ legal process to address the situation. Never engage directly on any illegal intimidation of any sort.

Reference documents:

- Human Rights Policy (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/human-rights-policy.pdf>)
- Vale's Code of Conduct (http://www.vale.com/EN/aboutvale/ethics-and-conduct-office/code-of-ethics/Documents/codigo-conduta-etica/code-of-ethics_conduct_vale.pdf)
- Business Human Rights – Vale's Positioning (<https://www.business-humanrights.org/en/search-results?langcode=en&keywords=Companhia+Vale+do+Rio+Doce+%28now+Vale%29&page=0>)

A.2. BOARD LEVEL ACCOUNTABILITY

A.2.1. Commitment from the top

Additional Information

The Message from the Chief Executive Officer is possible to see on the Sustainability Report 2015, page 11.

Vale's Human Rights Policy was approved at the highest level of company management, the Board of Directors.

At the 2014 Sustainability Report, Vale's CEO mentions how relevant the value of life is to the company and talks about Vale's approach to minimize safety risks. He also talks about the necessity to dialogue with the communities adjacent to Vale's projects, as well as to manage and mitigate environmental and social impacts.

He also addresses Vale's commitment on promoting the rational use of water, stimulating the development of innovative technology.

He reaffirms Vale's commitment to the UN Global Compact relating to human rights, labour rights, combating corruption and the protection of the environment.

Reference documents:

- 2014 Sustainability Report (pages 25
(<http://www.vale.com/en/aboutvale/sustainability/links/linksdownloadsdocuments/2014-sustainability-report.pdf>)
- 2015 Sustainability Report (p 11)
<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>

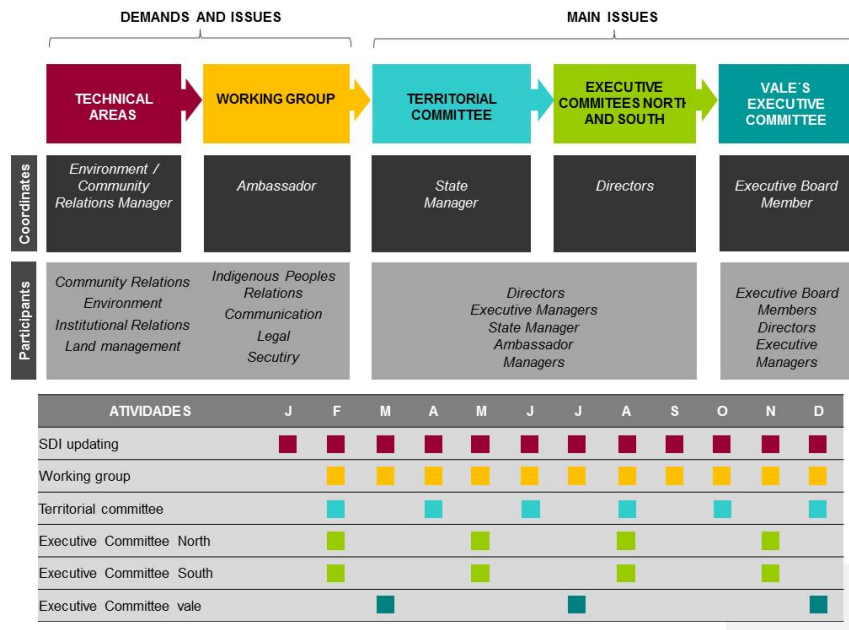
A.2.2. Board discussions

Additional information:

The Governance and Sustainability Committee, which is formed by the company's Board members, acts on human rights initiatives.

Community relations and environmental issues:

For Vale's operations in Brazil, the governance model to address community relations and environmental issues are addressed through the flow:



As shown in the flow, the issues are addressed through the different levels of the company. Vale's executive committee on community and environment meets every four months and includes the participation of executive board members.

Health and Safety Issues

The executive board meets every week. Vale's health and safety director participates on the meeting once a month, where she presents health and safety KPIs, reports critical potential accidents, critical accidents occurred and strategic initiatives taken at the period.

Reference documents:

- Vale's website
- (<http://www.vale.com/brasil/PT/investors/company/corporate-governance/board-committees-councils/Paginas/default.aspx#committees>)

A.2.3. Incentives and performance management

ADICIONAR KPI

Additional Information:

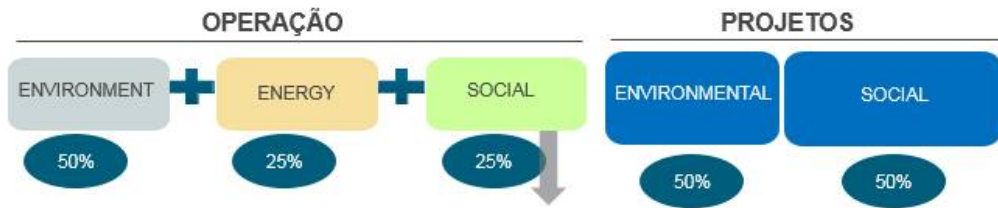
Vale's variable remuneration program (bonus) is based on key process indicators (KPI) of economic-financial performance, operational excellence and sustainability, linked to continuous improvement and applicable to all employees.

The Sustainability indicators cover aspects such as water, energy, emissions, residues, recovery of degraded areas, as well as indicators related to social issues.

- 2015 Sustainability Report (pages 28 and 29)

Sustainability Performance | Sustainability KPI – Social Dimension

Vale's variable remuneration program is based on indicators of economic-financial performance, operational excellence and sustainability, linked to continuous improvement. The Sustainability indicators cover aspects such as water, energy, emissions, residues, recovery of degraded areas, as well as indicators related to social questions at the operational units. Social indicators include critical issues for business and operations, which include, among others, the downtime reduction in railways and relationship and social investment plans in priority communities - formulated in a participatory and multidisciplinary way aiming to contribute to sustainable development of communities where the company operates.



The proposal of the Social KPI is to set targets linked to key social issues in the regions where Vale operates. The definition of the social dimension indicators is done by the operation with the Social normative area, which establishes guidelines and metrics and performs monthly monitoring and final assessment of the targets.



The following are the screens of the Community Relationship Plans management system, which are directly linked to variable remuneration processes and cover various aspects of Human Rights, among them: access to water, housing, mobility, support for income generation and Access to food, among others.

PLANO DE RELACIONAMENTO - ÍNDIOS DO MARANHÃO

Visão Geral

ESTUDOS DE COMPONENTES

NOME	PRÓXIMA ETAPA	CONCLUSÃO DA ETAPA
Estudo de Componente Indígena Tis Caru e Pindaré	Envio da Ficha de Caracterização da Atividade	26/08/2011 ✓

PLANOS BÁSICOS AMBIENTAIS

NOME	PRÓXIMA ETAPA	CONCLUSÃO DA ETAPA
Condicionantes de FUNAI para emissão de Licença de Instalação de duplicação de Estrada de Ferro Caru	Implementação das Ações PBA	31/12/2016 ●
PBA CI - Caru e Rio Pindaré	Análise com possível pedido de complement. pelo Orgão Resp.	01/01/2016 ●

ACORDOS E OUTRAS OBRIGAÇÕES

NOME	PRÓXIMA ETAPA	CONCLUSÃO DA ETAPA
1º Termo Aditivo ao acordo de Cooperação VALE/FUNAI/Índios do Maranhão	Fim da Vigência do Acordo	10/02/2017 ●
Termos de Cooperação VALE/FUNAI/Índios do Maranhão	Fim da Vigência do Acordo	10/02/2017 ●
Acordo de Cooperação 001/2003	Concluído	01/06/2007 ●
Acordo de cooperação 001/2002	Concluído	08/04/2003 ●
Acordo de cooperação N8130/2002	Concluído	30/11/2002 ●

QUESTÕES CRÍTICAS

NOME	CRITICIDADE	STATUS
Ação Civil Pública - Processo nº 61-827-77-2015-4-1.3700 - Protocolada na Vale em 21/07/2015	●	●
Incêndios nas Terras Indígenas Carú, Awá e Alto Turiaçu	●	✓
Manifestações de ONGs internacionais contra a Vale pelo potencial impacto ao povo Awá Guajá	●	●

AÇÕES VOLUNTÁRIAS

EM ANDAMENTO	CONCLUÍDA	TOTAL
8	19	27

INTERDIÇÕES (A PARTIR DE 01/07/2016)

INTERDIÇÕES E DEINTERDIÇÕES	AMEAÇAS	AMEAÇAS NEUTRALIZADAS
0	0	0

PLANO DE RELACIONAMENTO - ÍNDIOS DO MARANHÃO




Ações Voluntárias


← 1 de 6 →



Nome	Próxima Etapa	Prazo Conc. Próx. Etapa	Valor Planejado Ano	Valor Executado YTD
1 Apelo aos Indígenas na TI Alto Turiaçu devido ao Incêndio	Concluído	24/12/2015	0,0	0,0
2 Apelo à festividade de final de ano da TI Rio Pindaré	Fim da Implantação	24/12/2015	0,0	0,0
3 Apelo aos Indígenas no Combate de Incêndios Florestais na TI Carú	Concluído	14/12/2015	0,0	0,0
4 Apelo aos incêndios na TI Caru, TI Awá e TI Alto Turiaçu	Fim da Implantação	31/01/2016	0,0	0,0
5 Sobrevoos na Terra Indígena Caru	Concluído	13/11/2015	0,0	0,0

● Não iniciado ● No Prazo ● Risco de Atraso ● Atrasada ● Suspensa ● Cancelada ✓ Concluída









Ações do PBA - Condicionantes da FUNAI para emissão da Licença de Instalação da duplicação da Estrada de Ferro Carajás nas áreas contíguas as Terras Indígenas Caru e Rio Pindaré > Detalhamento   








Programa de Comunicação para Trabalhadores STATUS 



PRÓXIMA ETAPA Nina Fassarella e José Sousa


PLANO DE TRABALHO

PROGRESSOS	PROBLEMAS	PLANOS
<p>Até o momento, o efetivo total de trabalhadores na obra de ampliação da EFC no trecho limítrofe a TI Caru é de 832 trabalhadores, sendo que 305 é de mão de obra local. Já foram capacitados 2.346 trabalhadores.</p> <p>Atualização do efetivo em 02/05/2016: Efetivo Total: 832 Efetivo Local: 305 Efetivo de outras localidades: 327</p>		

TAREFA	RESPONSÁVEL	PRAZO CONCLUSÃO	DATA CONCLUSÃO	
Capacitação da última turma de trabalhadores	Jose de Sousa	01/10/17	-	
Meta 2016 - Repassar orientações sobre normas de conduta no relacionamento com os povos indígenas para 100% dos empregados da Vale e terceirizadas alocados em trechos c	Nina Fassarella e José Sousa	20/12/16	-	
Repassar orientações sobre normas de conduta no relacionamento dos empregados da Vale e terceirizadas com os povos indígenas que fazem interface com o empreendimento EFC	José Sousa	20/07/16	20/07/16	
Repassar orientações sobre normas de conduta no relacionamento dos empregados da Vale e terceirizadas com os povos indígenas que fazem interface com o empreendimento EFC	José Sousa	19/07/16	19/07/16	
Repassar orientações sobre normas de conduta no relacionamento dos empregados da Vale e terceirizadas com os povos indígenas que fazem interface com o empreendimento EFC	José Sousa	14/07/16	14/07/16	
Repassar orientações sobre normas de conduta no relacionamento dos empregados da Vale e terceirizadas com os povos indígenas que fazem interface com o empreendimento EFC	José Sousa	12/07/16	12/07/16	
Repassar orientações sobre normas de conduta no relacionamento dos empregados da Vale e terceirizadas com os povos indígenas que fazem interface com o empreendimento EFC	José Sousa	12/07/16	12/07/16	
Repassar orientações sobre normas de conduta no relacionamento dos empregados da Vale e terceirizadas com os povos indígenas que fazem interface com o empreendimento EFC	José Sousa	08/07/16	08/07/16	

 Não iniciado
  No Prazo
  Risco de Atraso
  Atrasada
  Suspensa
  Cancelada
  Concluída









PBA - Índios do Maranhão  








PBA CI - Caru e Rio Pindaré STATUS 

PRÓXIMA ETAPA Análise com possível pedido de complement. pelo Órgão Resp.

PLANO DE TRABALHO

PROGRESSOS	PROBLEMAS	PLANOS
<p>O PBACI já foi protocolado na FUNAI no dia 03/11. Em 04/11 o Kleber Karipuna, em nome da Consultoria Contexto providenciou a entrega das cópias do PBACI nas comunidades indígenas.</p>	<p>Ponto de Atenção: FUNAI demorar além dos 90 dias para emissão do Parecer Técnico do PBACI</p>	<p>A Funai terá 90 dias para emissão de Parecer Técnico sobre o PBACI.</p>

TAREFA	RESPONSÁVEL	PRAZO CONCLUSÃO	DATA CONCLUSÃO	
Entrega das considerações Vale (equipe multidisciplinar) sobre a versão preliminar do PBA	Nina Fassarella	24/06/15	24/06/15	
Ofício para Funai Informando status das condicionantes para liberação da obra	Nina Fassarella	10/06/15	10/06/15	
Entrega da matriz lógica do PBA pela Consultoria(20/03 a 08/06)	Consultoria	08/06/15	08/06/15	
Entrega de versão preliminar do PBA pela consultoria	Consultoria	08/06/15	08/06/15	
Oficinas nas Aldetas para elaboração PBA (09/03 a 19/03)	Nina Fassarella	19/03/15	19/03/15	
Reunião Aldeta Januária (TI Rio Pindaré) com Funai para aprovação Plano de Trabalho PBA	Nina Fassarella	10/03/15	10/03/15	
Reunião de alinhamento CGIIRC/FUNAI (Recem Contato)	Ana Edilte	02/03/15	02/03/15	
Treinamento das equipes (Vale e Terceiros) - Programa de Comunicação (sondagem, monitoramentos, supressão, obra)	Nina Fassarella	23/02/15	23/02/15	

 Não iniciado
  No Prazo
  Risco de Atraso
  Atrasada
  Suspensa
  Cancelada
  Concluída



In addition to fixed-sum remuneration, the Executive Directors and other company leaders receive bonuses and incentive payments insofar as they meet individual and collective goals to achieve the company's strategic results, related to financial, operational/ technical and sustainability indicators.

The Board and all Vale's leadership have a bonus related to health and safety. The target includes the performance on three indicators:

1. implementation of the Integrated Management System (HSE)
2. implementation of the Critical Activities Requirements*
3. this one can be chosen from a list of indicators, being one of the options related to community safety

* These activities considered more critical at Vale's operations have very strict procedures and requirements that must be accomplished.

All employees, including the Executive Directors and other company leaders, have a Sustainability KPI which is part of their variable remuneration scheme. The Sustainability indicator includes the execution of the community relations plan determined at the beginning of each year for each operation.

Reference documents:

- 2014 Sustainability Report (page 202)
(<http://www.vale.com/en/aboutvale/sustainability/links/linkdownloadsdocuments/2014-sustainability-report.pdf>)
- 2015 Sustainability Report (pages 28 and 29)

(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

B. EMBEDDING RESPECT AND HUMAN RIGHTS DUE DILIGENCE

B.1. EMBEDDING RESPECT FOR HUMAN RIGHTS IN CULTURE AND MANAGEMENT SYSTEMS

B.1.1. Responsibility and resources for day-to-day human rights functions

Additional Information:

To clarify the efforts for accountability and resources for human rights activities, we can cite the document published in the newspaper Valor Economico (Brazil), which presents the methodology of the Social License to Operate. We present 2 cases where the company through internal processes of strategic assessment, incorporating aspects of human rights, changed projects minimizing environmental and social impacts.

The Executive Director for Human Resources, Health and Safety, Sustainability and Energy manages human rights issues, including the ILO core labour standards.

Vale has a unit dedicated exclusively to human rights within Community Relations Department. The human rights team has the following responsibilities:

- Ensure general standards are set regarding business and human rights at Vale;
- Keep the Human Rights Policy up to date, in accordance with progress in external discussions and internal practice;
- Disseminate the Human Rights Policy internally and externally;
- Develop and implement the monitoring process of human rights issues (due diligence) throughout the life cycle of its projects in the company's different business sectors, in Brazil and in Vale's priority countries;
- Develop tools and methodologies to assess risk and impact and manage human rights issues;
- Ensure that human rights risk and impact assessments are carried out;
- Develop human rights training strategies for Vale's employees overall and provide training;
- Represent Vale at international business and human rights forums in order to share best international practice with our peers and keep Vale up to date with progress being made on this issue;
- Coordinate the company's response to allegations of human rights violations and formulate action plans when necessary;
- Support the development of management strategies for human rights issues;
- Report on Vale's performance with regard to the management of its impact on human rights;
- Seek the continuous improvement of Vale's social performance in the field of human rights.

In addition to the human rights team, other teams deal with human rights-related issues both at the corporate and at the operational and local level. They are, mainly: Human Resources, Health and Safety, Indigenous Peoples, Security, Environment, Socioeconomy, Procurement, Contract Management and Land Acquisition.

The following table shows how responsibilities are defined:

		Potential Human Rights Impacts												
		Labor Practices			Community Relations						Value chain		Security and Human Rights	
		Workers Health and Safety	Freedom of association and collective bargaining	Discrimination / Harassment	Community Health and Safety	Resettlement	Indigenous Peoples	Livelihoods / Income Generation	Access to water and sanitation	Sexual Exploitation of Minors	Forced Labor	Child Labor	Private Security	Public Security
Corporate Teams	Human Resources		A	A										
	Health and Safety	A			A									
	Indigenous peoples						A							
	Security									A	A	A	A	
	Environment								A					
	Socioeconomy				A	A		A	A	A				
	Procurement	B									A	A		
Operational/Local teams	Human Resources		C	C										
	Health and Safety	C			C									
	Indigenous peoples				C		C							
	Community Relations				C	C		C	C	C				
	Land aquisition					C								
	Security										C	C	C/D	
	Environment								C					
	Vale Foundation									C				
Contract Management	D		D	D					D	D	D			

A	Define policies and procedures
B	Establish rules for purchasing
C	Implement processes locally
D	Monitor contractors

The human rights team seeks to maintain a close working relationship with these teams and offers the necessary support.

Reference documents:

- Social License to Operate (http://www.valor.com.br/sites/default/files/case_2_-_gleuza_jesue_-.pdf)

B.1.2 Incentives and performance management

Additional Information:

Vale's variable remuneration program (bonus) is based on key process indicators (KPI) of economic-financial performance, operational excellence and sustainability, linked to continuous improvement and applicable to all

employees. The Sustainability indicators cover aspects such as water, energy, emissions, residues, recovery of degraded areas, as well as indicators related to social issues.

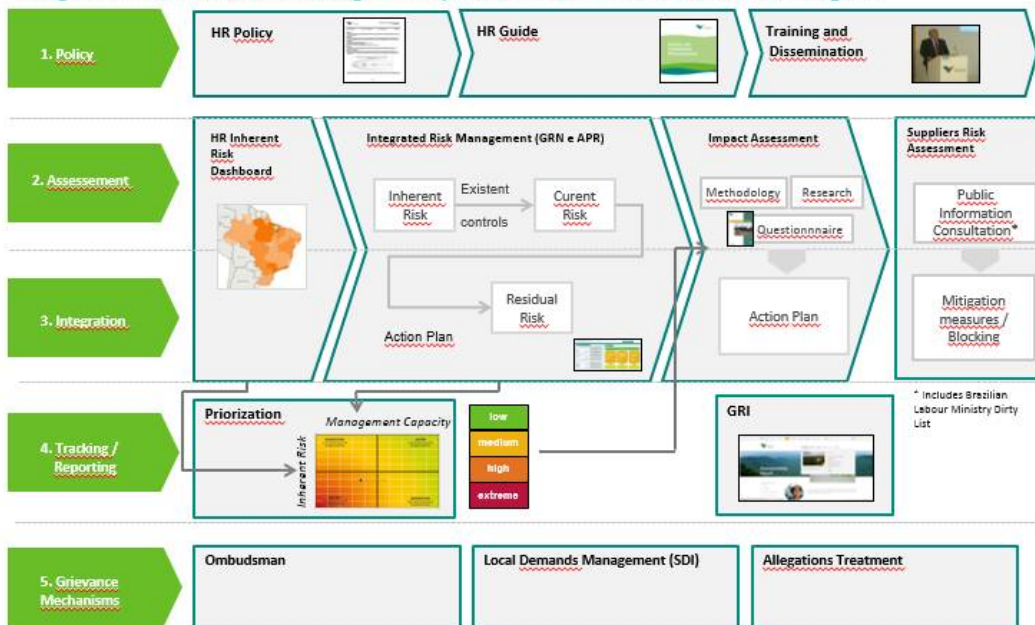
Not only the Executive Board, but also all Vale main executives have sustainability indicators related to incentive payments described at A.2.3.

B.1.3. Integration with enterprise risk management

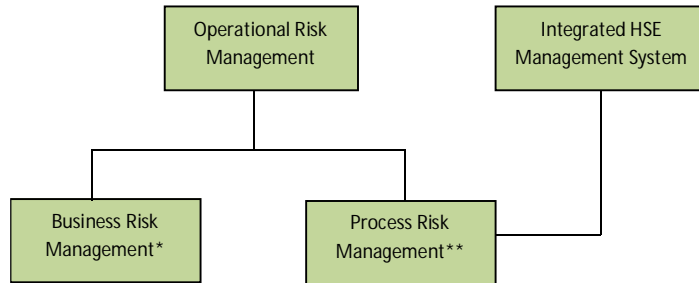
Additional Information:

HR Management Process

Aligned with the UN Guiding Principles on Business and Human Rights



In 2015 Vale integrated human rights aspects into its Operation Risk Management Model, which addresses processes and business risks. The processes risk management requirement is also part of Vale’s Integrated HSE Management System.



*Main risks related to health, safety, environment, reputational, financial and human rights (community rights, workers’ rights and security and human rights).


**Risks related to processes (more detailed) related to health, safety, environment and community rights. Risk Management is one of the 12 requirements of the Integrated HSE Management System.

The figure below shows the requirement 2 of Vale’s Integrated Management System Manual.

2. Hazards and Risks/Aspects and Impacts/Management of Change

Vale's business is managed to identify and register risks and opportunities that may influence the range capability of the expected results, minimizing risks and impacts and maximizing opportunities according specific evaluation matrix. This process considers legal requirements, hazard and aspects identification, impacts and risks assessment

- 3 de 14 -

Vale’s Integrated Management System Manual 

Rev.: 01 - 03/31/2016 INTERNAL USE

and the adoption of appropriate measures to control health, safety, environment, communities and human rights risks and impacts for its activities, the organization context and stakeholder requirements.

The areas shall ensure that the management of risks and impacts is implemented as matrix, implementing the necessary controls, according controls hierarchy.

The monitoring of operational risks is one of the responsibilities of the Fiscal Council, which carries out the role of the Audit Committee.

Reference documents:

- Vale’s Integrated Management System Manual – internal document
- NFN 0001 – Planning, Development and Management Standard - internal document
- Vale’s website (<http://www.vale.com/en/investors/company/corporate-governance/board-committees-councils/Pages/default.aspx#fiscal-council>)
- 2015 Sustainability Report p. 50

(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

B.1.4. Communication / dissemination of policy commitment

B.1.4.a. Communication / dissemination of policy commitment within Company's own operations

Additional Information:

Besides the version in Portuguese, English and Spanish, Vale's Code of Conduct is also available in: French, Mandarin, Japanese, Korean and Indonesian/Bahasa. More information regarding training as a dissemination of policy commitment can be found in B.1.5. In relation to the Human Rights training and dissemination, Vale has since 2008 trained all security personnel (own employees and contractors) on a yearly basis on Human Rights and Security Forces. Vale has since 2010 developed a Human Rights on line training course available to all employees and contractors. In 2010 Vale also developed the Human Rights Guide for the employees and contractors and updated it in 2014. It has trained its leaders in Brazil and Mozambique since 2003, having developed a specific training with FGV-SP, a recognized law University with experience in Human Rights. In 2013, a strategic education plan on human rights was established. We continued training our leaders on this subject, in Brazil (Maranhão, Pará, Minas Gerais, Espírito Santo and Rio de Janeiro) and in Mozambique (Maputo, Beira, Nampula, Nacala and Tetê), as well as implemented specific training for teams that work directly on communities relationships. In total, 500 hours of training on human rights with the participation of 459 employees were completed. In addition, about 400 employees from Mozambique participated in an event to raise awareness on the topic. We continued with our strategic education plan on human rights, establishing the training required for our leaders and employees according to their activities, especially in the area of corporate security. In 2016, we launched a video that has been spread on our internal communication channels maintaining our commitment to raise the awareness on the topic in all our employees: <https://www.youtube.com/watch?v=TDy2aJsTiao>
All Vale employees have to sign a document confirming its commitment to Vale's Code of Conduct.

Fundamental Principles described at the Code include:

- Respect for life, with attention to preventive measures, care for well-being in the workplace, health and safety, facilities and routines in the Vale System, valuing its employees;
- The protection, promotion and awareness of Human Rights in its activities and throughout its supply chain in accordance with the principles of the Universal Declaration of Human Rights;

Vale's Code of Conduct is available in: Portuguese, English and Spanish.

Vale's Human Rights Policy is disseminated mainly through the trainings described at indicator B.1.5 and through internal communication campaigns.

Vale uses internal channels to communicate its commitments to its employees and to give guidance on what it actually means to respect human rights in their day-to-day lives. In 2013, for example, a Vale Foundation partnership with Canal Futura resulted in the production of eight videos on human rights in the corporate world. The videos are available at [<http://fundacaovale.org/pt-br/noticias/ultimas-noticias/Paginas/um-estimulo-a-reflexao-sobre-direitos-humanos-no-universo-corporativo.aspx>]. In 2014, the company organized an internal communications campaign to show the videos and encourage managers to talk about these issues with their teams.

Vale's annual Sustainability Report, which follows the Global Reporting Initiative (GRI) guidelines, describes how the company deals with its impact on human rights. The report also describes our progress in applying the UN Global Compact principles.

Concerns, denunciations and allegations of human rights violations can come from different sources. Denunciations received by the Ombudsman are dealt with through its established treatment flow. Other formal allegations that require the company to take a position are analyzed and dealt with by the interested parties of the company. The company produces and communicates action plans when such denunciations identify failures in its procedures.

Reference documents:

- Vale's Code of Conduct (http://www.vale.com/EN/aboutvale/ethics-and-conduct-office/code-of-ethics/Documents/codigo-conduta-etica/code-of-ethics_conduct_vale.pdf)
- Business and Human Rights Resource Center Survey (<http://business-humanrights.org/en/vale-0>)
- Que direito é esse? (<http://fundacaovale.org/pt-br/noticias/ultimas-noticias/Paginas/um-estimulo-a-reflexao-sobre-direitos-humanos-no-universo-corporativo.aspx>)

B.1.4.b. Communication / dissemination of policy commitment to business partners
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Additional information:

The Supplier Code of Conduct requires us to comply with the Human Rights Policy, which describes the institutional commitment towards the UN Global Compact.

Below standard contractual clause concerning the accession of partner companies in commitments on human rights by Vale.

"Comply with the Supplier Code of Conduct, the Sustainable Development Policy on Human Rights Policy on Health and Safety Policy and the Greenhouse Gas Program Protocol (GHG) VALE, which were reported to the CONTRACTOR previously the formalization of this Agreement, integrate it as an integral and inseparable part, and will remain available on the website www.vale.com throughout their lifetime; and

CONTRACTOR in all its activities related to this Agreement and on behalf of VALE comply, at all times, with all regulations, laws and applicable laws, including but not limited to, the Foreign Corrupt Practices Act (15 USC § 78 - dd-1, et seq., as amended) and the Brazilian anti-corruption law (law No. 12,846 / 2013), as well as any other anti-bribery law, anti-corruption law or the law on conflicts of interest applicable to the Contractor or to VALE " Since 2010, in Brazil, the company includes a sustainability clause in contracts with suppliers making it obligatory for suppliers to comply with the Code of Ethics and Conduct for Vale's Suppliers and to adopt Vale's the Sustainable Development Policy and the Human Rights Policy.

Also to be registered at our supplier database, all companies must sign a commitment term where they agree to:

- accept the principles contained in the Vale Suppliers' Code of Ethics and Conduct;
- strive to comply with the terms and conditions of the Code and to seek to keep in line with it, to develop it and to integrate it into management processes;
- seek to share with Vale and its respective network of suppliers its efforts, difficulties and achievements in incorporating the proposed practices aiming at the sustainability of the company's business

Reference documents:

- Suppliers Code of Conduct (http://www.vale.com/pt/suppliers/code_conduct/documents/codigo-etica-conduta-fornecedor.pdf)
- Business and Human Rights Resource Center Survey (<http://business-humanrights.org/en/vale-0>)

B.1.5. Training on human rights

The initial focus of our human rights training strategy was the Company Security Department. Since 2008, an average of 3,500 employees and outsourced workers in this area have been trained every year. The second step was to establish a partnership with the Law School of the Getúlio Vargas Foundation (FGV) in São Paulo for the development of a training course on Business and Human Rights with a focus on the main issues in the mining sector and, specifically in Vale. The course was developed in 2012 and 2013 and then used to train the company's senior officers (directors, managers and supervisors) in both the corporate and operational areas in Brazil and Mozambique. The partnership also involved training the Community Relations teams that work with our operations and projects in Brazil. In 2014, we prepared and organized a training course specifically for company security staff, given their important role in managing contracts with security service providers and the scope for them to act as replicators of company practices. In total, 127 professionals were trained and are capable of replicating the courses for service provider employees, which they do on an annual basis.

The trainings for the Security teams are mainly focused on security-related human rights issues and are mandatory and the trainings for Community Relations teams, on community rights.

Reference documents:

- Business and Human Rights Resource Center Survey (<http://business-humanrights.org/en/vale-0>)

B.1.6. Monitoring and corrective actions

Additional Information:

More can be founded in item B.2.1

The actions to monitor our human rights policy commitments are:

Human rights due diligence

The Global Human Rights Management Panel tool, developed in partnership with VeriskMaplecroft (<https://www.maplecroft.com/>) identifies inherent risks of violating human rights in the places where Vale is present. The Panel includes all Vale operations, projects and offices in the world, which are presented in the form of a georeferenced map.

The existing risk management processes at Vale have in place an auditing model through the HSE Management System. Since human rights is being included at these processes, Vale plans to include in 2017 human rights aspects as part of the auditing process. This way we will be able to guarantee that risk management considers human rights potential impacts.

Employees

Our Health and Safety approach is well detailed at our Sustainability Reports.

Vale's rigorous process for hiring and control the access to its facilities makes that the risk of forced or child labor among employees does not exist.

Vale has an ombudsman channel, the Ethics and Conduct Office, which is accessible to all workers to raise complaints/concerns, including those related to discrimination and harassment. Data related to discrimination cases are reported annually at the Sustainability Report.

Engagement with labor union occurs through constant dialogue, including formal meetings to deal with relevant matter, including health and safety.

The formal collective agreement for Brazilian operations includes the permission for labor unions to conduct campaigns inside Vale's operations and offices.

Security teams (employees and contractors)

Our security teams (employees and contractors) are trained in human rights. In 2015, 2,631 employees and contractors were trained.

Our security teams working locally at our operations are responsible for monitoring contractors of private security forced performance and compliance to Vale's policies.

Local, indigenous and traditional communities

To engage with local communities, each operational site has a team of Community Relations which is responsible to identify potentially affected people, engage with them and manage their concerns and impacts caused by Vale's operations and projects. The Relations Community teams are responsible for receiving the complaints and guarantee that these are addressed by the operational areas. They are responsible to monitor the solution of these problems.

We also have specialized local teams who engage with Indigenous Peoples, with the same role.

To better organize, manage and address their (local communities, including indigenous peoples) concerns there is a tool called SDI – Stakeholder, Demands and Issues, where complaints, demands, issues and stakeholders are registered.

Governments and society

Through the Global Human Rights Management Panel tool we also monitor the allegations of human rights violations involving the company. This data is updated weekly.

Relevant issues for the mining industry

Involuntary resettlements must be conducted in accordance with our Involuntary Relocation Guidelines Norm, in place since 2014, developed in line with international guidelines, particularly those defined by the World Bank and the International Finance Corporation (IFC).

Vale monitors the presence of artisanal and small-scale mining along its operations. The presence is very low.

Suppliers (contractors), partners and customers

Vale has a team called NACT (Núcleo de Análise de Contratos com Terceiros - Centre for Contract Assessment in Portuguese) which provides technical service analysis of labor and social security data for Vale contract managers. This service aims to minimize the risk of disrespect of labour rights from contractors acting within Vale's premises.

Sample analysis of documentations are conducted to ensure compliance with legislation regarding the payment of wages, benefits and discounts, compliance with collective agreements, registration of employees and validity of any dismissals, compulsory social insurance costs and payment of FGTS (Fundo de Garantia por Tempo de Service - Guarantee Fund for Length of Service in Portuguese).

Based on these analyzes, discussions are held with the contractors in order to clarify any discrepancies and corrections are demanded. When corrections are not done, contract managers must impose the appropriate sanctions specified in the contract.

Besides that, our process to assess the performance of contractors, called IDF (Índice de Desempenho do Fornecedor – Supplier Performance Index in Portuguese), includes a chapter regarding legal labour obligations.

B.1.7. Engaging business relationships

Additional Information:

Complementing the submitted information, we would like to cite the case of the Vale where the company suspended the supply of iron ore to pig iron producers as it had been following the development of assessments, processes and investigations carried out by agencies of the federal and state governments in region of Pará and Maranhão specifically, and also police stations of Labour, Ministry of Labour, on environmental issues and slave labor or degrading labor in the chain of cast iron. Vale repeatedly warned its customers that it would not condone any activity that was violating environmental legislation and labor legislation, a situation that led to the filing of Class Action by IBAMA (Environmental Agency of Brazilian Government). The interruption of supply of ore, proved that Vale is committed to environmental and respect for human rights responsibility practices.

It is part of Vale's procedures, when registering into its procurement data base new service providers who will act inside Vale's facilities, to verify compliance with labor legal obligations. Irregularities and unwilling to address them will cease the registration process.

Not signing Suppliers' Code of Ethics and Conduct will also cease the registration process of any supplier candidate.

The monitoring of the "dirty list" of the Brazilian Ministry of Labor and Employment is also part of the registration process. However, the search is suspended due to the injunction granted by the Supreme Court preventing disclosure of the document. Where official information confirms the relationship of a supplier with slave labor and / or child labor blocking measures are considered.

Vale's due diligence for merge and acquisition considers human rights aspects.

Example of engagement with supplier to combat child labor: It was identified the occurrence of child labour in car washes and vehicle workshops, used by some of the Vale's suppliers, in the municipalities of Canaa dos Carajas and Parauapebas, in the Southeast of Para (Brazil). To deal with this, Vale, which normally takes action to guarantee that its production chain is not involved in situations of this type, promoted two workshops during the year for updating the status of action plans developed by suppliers in the region, which also had local Public Authorities participation.

Reference documents:

- Vale's Press Release
(http://saladeimprensa.vale.com/Paginas/Releases.aspx?r=Position_Paper_sobre_corte_de_fornecimento_de_minerio_a_guseiros&s=Meio_Ambiente&rID=1244&sID=2)
(http://saladeimprensa.vale.com/en/Paginas/Articles.aspx?r=CVRD___announcement&s=Mining&rID=687&sID=6)

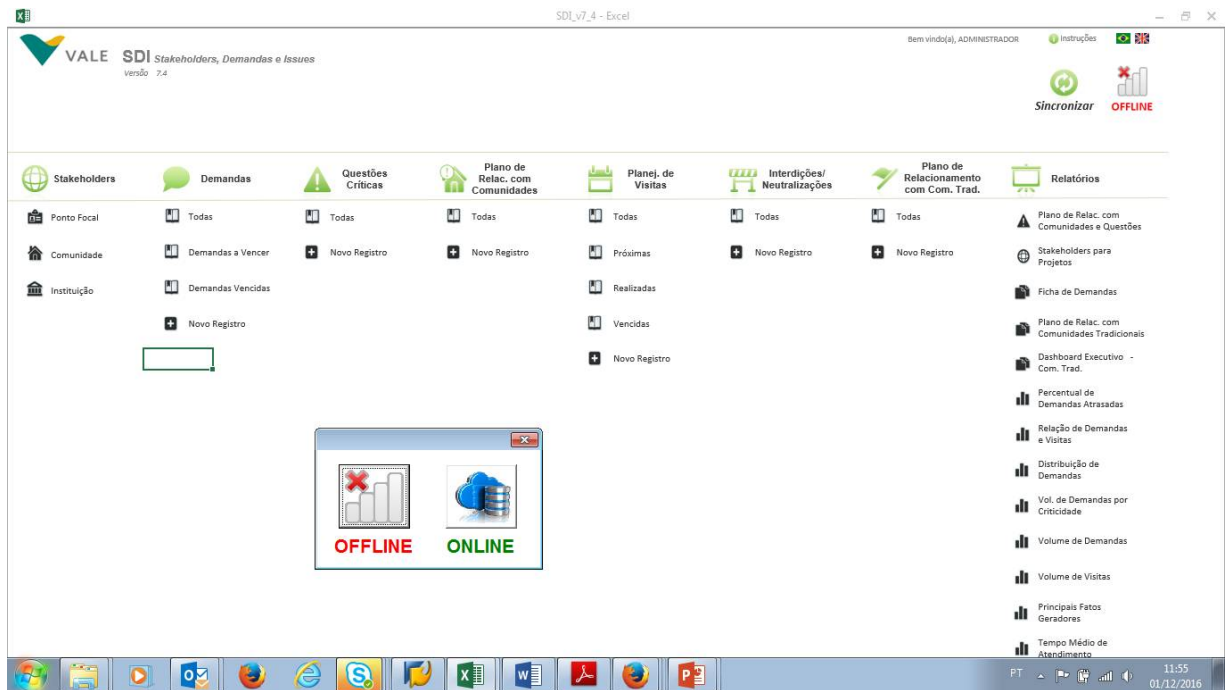
B.1.8. Framework for engagement with potentially affected stakeholders

Additional information:

To better organize, manage and address all the stakeholders (including NGOs, indigenous peoples and resettled communities.) concerns there is a tool called SDI – Stakeholder, Demands and Issues, where complaints, demands, issues and stakeholders are registered.

This system enables professional relationships with communities and managers of related topics, including institutional relations and human rights, to manage the registration demands, submitted solutions, the results, monitor action plans by stakeholders, and monitor specific processes such as environmental licensing processes (including studies and full of action) to indigenous peoples and traditional communities.

Based on criticality, urgency or severity of the demand, the system information to prove the critical issues committees where participating directors of operations, projects and corporate areas Vale who are responsible for addressing the demands presented.



Our main potentially affected stakeholders are local communities and workers.

To engage with local communities, each operational site has a team of Community Relations which is responsible to identify potentially affected people, engage with them and manage their concerns and impacts caused by our operations and projects. The interactions occur on a day to day basis, being very regular.

We also have specialized local teams who engage with Indigenous Peoples.

To better organize, manage and address their (local communities, including indigenous peoples) concerns there is a tool called SDI – Stakeholder, Demands and Issues, where complaints, demands, issues and stakeholders are registered.

These are the main channels used for dialogue:

- Participatory Socioeconomic Assessments
- Participatory Formulation of Social Relationships and Investment Plans
- Aló Ferrovia – available to Vale train passengers and communities
- Contact Us (available through Vale's website)
- Ombudsman (available through Vale's website)
- External publication — Newsletter
- Direct contact with Community Relations Department team (in person and by telephone).

Workers can be affected mainly through impacts on their health and safety. Vale has a robust program to manage these risks, including the engagement of employees and contract workers.

Other possible impacts such as discrimination and harassment are addresses through our ombudsman channel, which guarantees confidentiality.

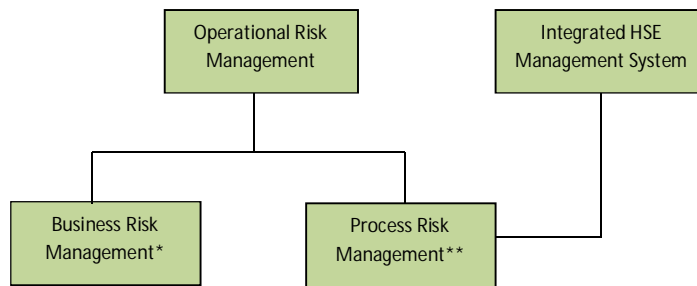
Reference documents:

- Business and Human Rights Resource Center Survey (<http://business-humanrights.org/en/vale-0>)

B.2. HUMAN RIGHTS DUE DILIGENCE

B.2.1. Identifying: Processes and triggers for identifying human rights risks and impacts

As describe at indicator B.1.3, in 2015 Vale integrated human rights aspects into its Operation Risk Management Model, which addresses processes and business risks. The processes risk management requirement is also part of Vale’s Integrated HSE Management System.



*Main risks related to health, safety, environment, reputational, financial and human rights (community rights, worker rights and security and human rights).

**Risks related to processes (more detailed) related to health, safety, environment and community rights. Risk Management is one of the 12 requirements of the Integrated HSE Management System.


This is the way Vale intends to identify and address human rights risks among all its operations.

The Operational Risk dashboard is consolidated every three months. This is the cycle expected for operations to update their action plans and monitor its results.

The figure below shows the first page of Vale’s Manual for Operational Risk Management which details the whole process, highlights the importance of the integration of diverse themes, including social and human rights, as well as the governance model.

01. What's the purpose of this manual?	02. Why do we need to manage risks?	03. Why is it important to be integrated?	04. Preparation to build the risk management plan	05. Build the risk management plan	06. Monitoring and review of risk management plan	07. Execution and management risk roles	08. Integrated management model governance	09. Attachments
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01. What's the purpose of this manual?



Life matters most

Improve together

Value our people




This manual was developed with the purpose of assist the implementation of the operational risk management integrated model in business and support areas.

The NFN-001 highlights key topics and subjects of the operational risk management at Vale. Based on that, the manual is intended to be more detailed working as a step-by-step to the effective implementation of the integrated model.

It will be approached topics that will allow a conceptual base, followed by processes that should be executed between the different methods, roles and responsibilities of everyone that takes part. The training guide available, the list of specific methods and a glossary.


Enjoy your reading!



Do what is right

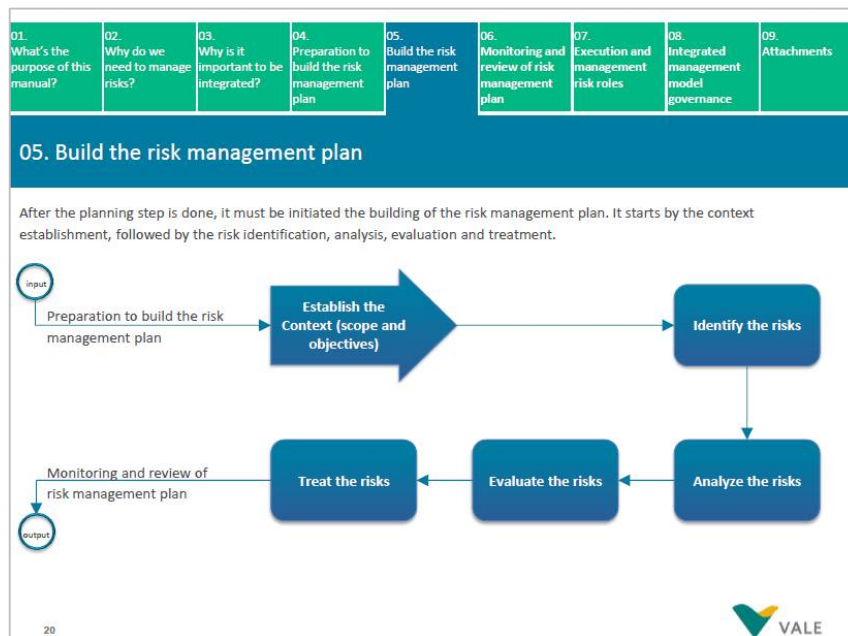
Prize our planet

Make it happen



2

The following figure shows the process of risk management plan.



The next one shows the monitoring and review of risk management plan process.



By now Vale has started to include human rights aspects at some of its main operations:


- EFC (Railway)
- S11D (Mine)
- Nacala Corridor (Railway)
- Nacala Port (Port)

These operations were chosen due to their location at regions with high inherent risk of human rights violations (North of Brazil and Mozambique).

As mentioned at the indicator B.1.6, the Global Human Rights Management Panel tool, developed in partnership with VeriskMaplecroft (<https://www.maplecroft.com/>) identifies inherent risks of violating human rights in the places where Vale is present. The Panel includes all Vale operations, projects and offices in the world, which are presented in the form of a georeferenced map.

As mentioned at the indicator B.1.7, Vale's due diligence for merge and acquisition considers human rights aspects.

The figure below shows the first page of Vale's Human Rights Due Diligence Questionnaire for Merge and Acquisition.



Ficha de Avaliação de Direitos Humanos no Setor de Mineração e Metais¹
(Human Rights Due Diligence Questionnaire)

O respeito aos direitos humanos deve se dar em todos os projetos e operações da empresa, ao longo do ciclo de vida das suas atividades e em sua cadeia produtiva, nas regiões onde está presente. Para tanto, faz-se necessário o arcabouço normativo associado à análise de risco e o monitoramento permanente dos direitos humanos.

- Existência de Política, Norma ou Diretrizes de Direitos Humanos para a empresa, empregados diretos e indiretos e fornecedores. Se disponível, anexar.
- Realização periódica de análise de risco de violação aos Direitos Humanos pela empresa. Explicar procedimento.
- Explicitar riscos de violação aos direitos humanos no setor de Mineração e Metais presentes na atividade da sua empresa.
 - Saúde e Segurança dos empregados diretos e indiretos
 - Condições de Trabalho_{.....}
 - Carga horária excessiva
 - Interferência em Comunidades Tradicionais e Indígenas_{.....}
 - Aumento demográfico em função de processo migratório
 - Trabalho forçado
 - Trabalho Infantil
 - Liberdade de associação e negociação coletiva_{.....}
 - Relacionamento com governo – nacional e local_{.....}
 - Relacionamento com forças armadas_{.....}
 - Operações em zonas de conflito_{.....}
 - Utilização do produto como moeda para tráfico/ terrorismo_{.....}
 - Corrupção
 - Outros: _____
- Explicitar riscos de violação aos direitos humanos presentes no país/ região do empreendimento.
 - Elite política não representativa
 - Liberdade de expressão baixa ou ausente
 - Insuficiência dos instrumentos normativos
 - Baixa capacidade de implementação dos instrumentos normativos
 - Corrupção
 - Precariedade de infraestrutura e serviços públicos (saneamento, habitação, saúde, educação, etc.)
 - Pobreza e Desigualdade social
 - Baixo Capital Social
 - Outros: _____

¹ Fonte: Política Global de Direitos Humanos da Vale

Fev 2010 – Versão 1.0

As already mentioned, it is part of Vale’s procedures, when registering into its procurement data base new service providers who will act inside Vale’s facilities, to verify compliance with labor legal obligations. Irregularities and unwilling to address them will cease the registration process.

Not signing Suppliers Code of Conduct will also cease the registration process of any supplier candidate.

The monitoring of the "dirty list" of the Brazilian Ministry of Labor and Employment is also part of the registration process. However, the search is suspended due to the injunction granted by the Supreme Court preventing disclosure of the document. Where official information confirms the relationship of a supplier with slave labor and / or child labor blocking measures are considered.

Reference documents:

- NFN 0001 0001 – Planning, Development and Management Standard - internal document
- Human Rights Due Diligence Questionnaire for Merge and Acquisition – internal document

B.2.2. Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)

The process described to manage risks at B.2.1 includes: identification, assessment and integrating and action and monitoring.

Vale's potential human rights impacts are related to the following aspects:

Labor Practices

- Workers Health and Safety
- Freedom of association and collective bargaining
- Non Discrimination / Harassment avoidance

Community Relations

- Community Health and Safety
- Resettlement
- Indigenous Peoples
- Livelihoods / Income Generation
- Access to water and sanitation
- Sexual Exploitation of Minors combat

Value chain

- Forced Labor Combat
- Child Labor Combat

Security and Human Rights

- Private Security
- Public Security

Vale will produce an internal pilot on the Un Guiding Principles reporting Framework by the end of 2016. This process includes defining its salient human rights issues and reporting risks identified along operations.

B.2.3. Integrating and Acting: Integrating assessment findings internally and taking appropriate action

The process described to manage risks at B.2.1 includes: identification, assessment and integrating and action and monitoring.

The social vulnerability of the local communities where Vale operates along with the presence of mostly male workers especially during the construction phase of projects may raise, in certain circumstances, the risk of occurrence of sexual exploitation of minors. To prevent these occurrences Vale has implemented actions to strengthen social promotion and protection networks, raise public awareness and mobilize Vale employees, suppliers and the business sector in general to take action to stop sexual violence against children and adolescents at these regions.

Although this risk and the actions taken were initiate before the formal inclusion of human rights into Vale risk management tools and processes. Where the tools were applied, this risk was evaluated, existent actions were listed and recommendations for improvement were made.

Example of action:

In 2011, an International Federation of Human Rights (FIDH) launched the report entitled "Human Rights: The Impacts of the Mining and Steel Industry", which refers to violations of human rights violations by Vale in Maranhão. For. Among these allegations was the health impairment of the community of about 300 families, from the California settlement, in the municipality of Açailândia, Maranhão. This damage to the health of the community was the result of an emission from the Monte Libano farm (2005-2011), a Vale enterprise where charcoal was produced for the production of pig iron.

In 2013, a Vale hired a specialized health consultancy to conduct the survey of events, identify if there were human rights violations and find health improvement opportunities for the population.

After nine months of work, carried out in close partnership with a local community and as health authorities of the municipality, some conclusions were reached, among them an impossibility to establish a causal link between the supposed illness of the population in the past and the Mount Lebanon Farm.

As a follow-up to the study, the Vale Foundation voluntarily included the California settlement in community health support projects, supporting the reactivation of the local health station, including equipment and training of the health staff, as well as other programs. Since then, Vale's relationship with a community has improved significantly.

Reference documents:

- Business and Human Rights Resource Center Survey (<http://business-humanrights.org/en/vale-0>)
- 2015 Sustainability Report – p.32 (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

B.2.4. Tracking: Monitoring and evaluating the effectiveness of actions to respond to risks and impacts

The process described to manage risks at B.2.1 and B.2.3 includes: identification, assessment and integrating and action and monitoring.

In May 2012, Human Rights Watch carried out a field survey in Tete province, Mozambique, to evaluate the new settlements in Moatize district resulting from Vale's and Rio Tinto's coal mining activities. Based on the findings of this research and analysis of national and international human rights safeguards, Vale identified practical recommendations of greatest relevance.

The fact that Human Rights Watch based its research on concrete data and its problem-solving attitude made this engagement process a rich learning experience for Vale and highly beneficial for the resettled families.

In its report, Human Rights Watch recognized Vale's efforts to solve the problems presented by the resettled people and stressed that Vale and the government of Mozambique signed a memorandum of understanding. Almost all of the actions in this agreement have now been implemented.

Vale in Mozambique has been working continuously to improve the new settlements and is striving to take measures to support these families, together with the spheres of government and based on dialogue with these communities.

The process conducted for assess the settlements of the Tete province provided many lessons learned to conduct resettlement process and highlight relevant points to be considered at human rights risk assessments.

- Business and Human Rights Resource Center (<http://business-humanrights.org/en/vale-0>)

B.2.5. Communicating: Accounting for how human rights impacts are addressed

Additional Information:

In addition to giving visibility impacts and their positions in the media already informed (such as Sustainability Report and Business and Human Rights Resource Center website), licensing processes have own procedures for evaluating participatory way impacts the realization of hearings with the affected communities, including indigenous peoples and traditional communities. For these populations, specifically, the evaluation process predicts impacts adequacy language, time and form. Besides the specialized team of own company, experts are hired with knowledge of these populations, trained all employees who have contact with communities, including leaders and engineers responsible for the projects and operations of the company. For example, the expansion process of the Carajas railroad was presented by the team of engineers, relationships with communities and hired anthropologists, along with professionals from governmental agency responsible for assistance to indigenous peoples (FUNAI). The impact studies were carried out with the direct participation of indigenous, several workshops were held, each stage of the work was informed the indigenous, documented in prepared banners in every village, a professional was hired dedicated to accompany the work, guide employees and resolve doubt the natives. The construction of impact mitigation plan also used the same methodology were produced products in the language of these peoples, contracted NGOs to support the proper implementation of projects with the permanent monitoring of the FUNAI.

Vale reports annually its Sustainability Report and publicizes its responses to allegations at the Business and Human Rights Resource Center website.

- Business and Human Rights Resource Center (<http://business-humanrights.org/en/vale-0>)

C. REMEDIES AND GRIEVANCE MECHANISMS

C.1. Grievance channels/mechanisms to receive complaints or concerns from workers

Vale has an ombudsman channel, the Ethics and Conduct Office, which is accessible to all workers to raise complaints/concerns, including about human rights issues related to the Company.

The Ethics and Conduct Office, available for Vale's internal and external stakeholders, is a proactive, transparent, independent and impartial communications tool for reporting violations or suspected violations of any of the points described in our Code of Ethics and Conduct.

These may include possible accounting irregularities or improprieties or any other issues related to accounting, auditing, internal controls, standards, policies, ethics, human rights or the environment. The Ethics and Conduct Office may also be used when Vale's more everyday mechanisms for resolving problems, such as call centres, do not provide an adequate solution to a problem that has already been reported.

Complaints can be made through local phone number in many countries.


Toll-free: Callers may dial this line toll-free from within the appropriate country.

	Country	Phone	Language
Central and North America	Canada	866-590-7729	French, English
Central and North America	United States	866-607-1172	English
South America	Argentina	0800-555-9312	Spanish (Latin American)
South America	Brazil	0800-666-2451	Portuguese (Brazilian)
Asia and Oceania	Australia	0800-821-5000	Portuguese (Brazilian)
Asia and Oceania	China	1-800-658-495	English
Asia and Oceania	China	400-882-2054	Mandarin, English
Asia and Oceania	Indonesia	001-803-1-006-8066	Bahasa Indonesian, English
Asia and Oceania	Japan	00531-11-3620	
Asia and Oceania	Japan	0066-33-801234	
Asia and Oceania	Japan	0044-22-112627	
Asia and Oceania	Japan	0034-800-900103	Japanese, English
Asia and Oceania	Korea	00798-11-004-9317	
Asia and Oceania	Korea	00308-11-0530	
Asia and Oceania	Korea	00368-11-0123	Korean, English
Asia and Oceania	Singapore	800-110-1926	Malay, English, Mandarin, Tamil
Asia and Oceania	Thailand	001-800-11-002-2524	Thai, English
Europe and Africa	Norway	800-12220	Norwegian, English
Europe and Africa	South Africa	0800-999-616	English

For countries below, the callers can toll-free to the indicated phone-numbers and then dial: 866-423-4864

	Country	Phone	Language
South America	Chile	Chile (AT&T Chile) 171 00 311 Chile (AT&T Chile Spanish) 171 00 312 Chile (AT&T Node) 800-225-288 Chile (Easter Island) 800-800-311 Chile (Easter Island Spanish) 800-800-312 Chile (ENTEL) 800-360-311 Chile (ENTEL Spanish) 800-360-312 Chile (Telefonica) 800-800-288	Spanish (Latin American)
South America	Colombia	01-800-911-0010	Spanish (Latin American)
South America	Paraguay	01-800-911-0011	Spanish (Latin American)
South America	Paraguay	008-11-800	Spanish (Latin American)
South America	Peru	Peru (Americatel) 0-800-70-088 Peru (Telefonica) 0-800-50-288 Peru (Telefonica Spanish) 0-800-50-000	Spanish (Latin American)
Asia and Oceania	India	000-117	Hindi, English
Asia and Oceania	Kazakhstan	8 * 800-121-4321	Kazakh, Russian, English
Asia and Oceania	Philippines	Philippines (Bayan) 105-11 Philippines (Digitel) 105-11 Philippines (Globe) 105-11 Philippines (Philcom) 105-11 Philippines (PLDT) 1010-5511-00 Philippines (Smart) 105-11	Filipino, English
Asia and Oceania	Taiwan	00-801-10-288-0	Taiwanese, English
Europe and Africa	Angola	308-000-011	Portuguese
Europe and Africa	Switzerland	0-800-890011	French, English

Other countries, please make a collected call to the number: +55 21 3814 5000

How can I make an allegation?	Who can make an allegation?	How can I follow up on allegations?	Premises
<p>Anyone, whether or not connected with Vale, who feels negatively affected by Vale due to a violation of the Code of Ethics or our values, or who has a problem that has not been resolved through the company's everyday channels, may use the Ethics and Conduct Office.</p> <p>We are counting on the collaboration of Vale employees, contractors and communities, both in the ethical performance of their functions and in the reporting in good faith of suspected cases of violations of our standards of ethics and conduct.</p>			

Vale produces an annual report about the results of the Ethics and Conduct Office since 2014 which is accessible and communicated to all employees.

The 2015 report includes the themes listed at the figure below (summary print screen).

Summary	
Message from the executives	3
Introduction	6
Ethics and Conduct Office Reporting Channel	7
Inside the Ethics and Conduct Office	8
Receiving Allegations	9
Investigation of Allegations	12
Conclusion of Allegations	15
Ethics and Conduct Office Operation and Results	17
Evolution of Allegation Severity by Category	17
Recommendation Guide for Consequence Management	18
Benchmarking with Ethics and Conduct Offices at other Companies	19
Contact Channels	20
Promotion of Ethics	21
Ethics in Focus	22
Code of Ethics and Conduct	23
Video on Ethics for New Hires and Contractors Induction	24
Online Ethics Training on the VES	25
Creation of an Ethics and Conduct Network	26

All of the data presented in this report relates to allegations dealt with in 2015

INTERNAL USE ONLY

2015 Ethics and Conduct Office Results 2

Vale's channels are open to be used by contractor's employees.

All workers (including contractor employees) pass through the mobilization process when starting to work for Vale where they are informed about the Code of Ethics and Conduct and about the ombudsman channels, through this video: <https://www.youtube.com/watch?v=t08Wf9I6Zag>

Vale subsidiaries, joint ventures and associates use Vale's ombudsman channels and processes or have their own channel and processes. When Vale receives complaints related to them, Vale's Ethics and Conduct Office evaluates whether the company has the adequate independency to conduct the investigation. If so, the complaint is directed to the joint venture/associate; if not, the investigation process is conducted by Vale.

Reference documents:

- Vale's website (<http://www.vale.com/en/aboutvale/ethics-and-conduct-office/Pages/default.aspx>)
- Vale's website (http://www.vale.com/EN/aboutvale/ethics-and-conduct-office/make-complaint/Documents/Arquivo_Telefones_denuncias_EN.pdf)
- Vale's You Tube Channel (<https://www.youtube.com/watch?v=t08Wf9I6Zag>)
- 2015 Sustainability Report - pages 5, 23, 24,25 and 32 (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

C.2. Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities

As described at B.1.8, each operational site has a team of Community Relations which is responsible to identify potentially affected people, engage with them and manage their concerns and impacts caused by our operations and projects. The interactions occur on a day to day basis, being very regular.

We also have specialized local teams who engage with Indigenous Peoples.

To better organize, manage and address their (local communities, including indigenous peoples) concerns there is a tool called SDI – Stakeholder, Demands and Issues, where complaints, demands, issues and stakeholders are registered.

These are the main channels used for dialogue:

- Participatory Socioeconomic Assessments
- Participatory Formulation of Social Relationships and Investment Plans
- Alô Ferrovia – available to Vale train passengers and communities
- Contact Us (available through Vale's website)
- Ethics and Conduct Office (available through Vale's website)
- External publication — Newsletter
- Direct contact with Community Relations Department team (in person and by telephone).

Vale's channels are open to be used by communities regarding contractor's impacts.

All Vale subsidiaries use Vale's ombudsman channels and processes.

Hispanobras, Itabasco, Nibrasco and Kobrasco also use Vale's ombudsman channels and processes.

Regarding other joint ventures and associates, when Vale receives complaints relates to them, its ombudsman team evaluates whether the company has the adequate independency to conduct the investigation. If so, the complaint is directed to the joint venture/associate; if not, the investigation process is conducted by Vale.

Samarco, VLI and MSR have their own channels.

Reference documents:

- Vale's website (<http://www.vale.com/en/aboutvale/ethics-and-conduct-office/Pages/default.aspx>)

C.3. Users are involved in the design and performance of the channel(s)/mechanism(s)

The Ethics and Conduct Office conducts a research among employees annually. This research includes the perception of employees about the existent channels. Improvements can be done according to the results. In 2016, the research will take place in Brazil, Canada, Mozambique and Peru.

C.4. Procedures related to the mechanism(s) / channel(s) are publicly available and explained

Additional Information:

There are structured processes. The "climb" to higher hierarchical levels is expected and occurs according to the degree of complexity / severity / values involved. More information can be founded in A.2.2.

The procedures are explained at Vale's website, including that the results of each investigation within the channel's scope are directed to the chairman of the Board of Directors.

The Ethics and Conduct Office reports directly to the Board of Directors.

Further details on the procedures can be found at the 2014 and 2015 reports.

Reference documents:

- Vale's website (<http://www.vale.com/EN/aboutvale/ethics-and-conduct-office/faq/Pages/default.aspx>)

C.5. Commitment to non-retaliation over concerns/complaints made

"In all cases, confidentiality, independence, impartiality and immunity are guaranteed in the treatment, investigation and filing of information received. The rights of complainants and the people cited are also guaranteed, and any kind of retaliation against those who use the Ethics and Conduct Office in good faith is forbidden, regardless of the results of investigations. This tool should be used in a conscientious manner to maintain the credibility of the process."

It is established at the Suppliers Code of Conduct that "There will be no retaliation against employees or suppliers that make allegations in good faith."

We commit to include an affirmation that no supplier should conduct retaliation against workers to make use of the channel into the next revision of our Suppliers' Code of Ethics and Conduct which will take place before August 2016.

Reference documents:

- Vale's website (<http://www.vale.com/EN/aboutvale/ethics-and-conduct-office/faq/Pages/default.aspx>)
- Suppliers Code of Conduct (http://www.vale.com/pt/suppliers/code_conduct/documents/codigo-etica-conduta-fornecedor.pdf)

C.6. Company involvement with State-based judicial and non-judicial grievance mechanisms

Additional Information:

When the processes of remediation and dialogue are not sufficient for resolution, the judicialization is a possible, legally accepted and formal way.

Whenever a person or community identifies an impact, it can use the grievance mechanisms the company has available. The complaints are analyzed and, once it is understood the impact was caused by the company, Vale may implement a remediation. When there is room for negotiation, the company and the individual family or

community may engage in non judicial remediation negotiation. If they come to an agreement, the remediation process may be established and both parts are satisfied. When an agreement is not met, the person, family or community can engage in judicial remediation process. At any point of the negotiation, the person, family or community has the right to seek judicial remediation.

There are times the Public organs (environmental, indigenous, etc) engage with the company to reach an agreement with the impacted person, family or community. In this case, Vale engages in the process and seeks to find resolution to the grievance. That was the case of Piquiá de Baixo, where Vale was engaged by the Public Prosecutor in a non judicial process and has reached an agreement with the community to support their resettlement process.

Reference documents:

- 2015 Sustainability Report - p. 57 and 58
(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

C.7. Remediating adverse impacts and incorporating lessons learned
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Additional Information:

Throughout the internal processes of risk analysis and assessment of business viability, it is possible to identify possible strategic actions that make it possible to avoid or mitigate impacts on communities. We can cite 3 examples:

1 - Carajás Railroad Expansion Project - although the work is restricted to the safety belt currently used by the railroad, the presence of Indians of recent contact (Awá-Guajá People) was the main factor for the change in the original project that Provided for the installation of a large construction site, with the presence of large numbers of workers and machinery. The site was replaced by small ones, furniture and without accommodation.

2 - The design of a new iron mine in the State of Minas Gerais (Mina Serpentina), was initially designed to use a highway for production runoff. In identifying the interference in Indigenous Land, the predicted tracing was changed.

3 - The Onça Puma Mine in the State of Pará had its initial project altered so that there was no water catchment from the Cateté River, the main river for the Xikrin People of Cateté

The Resettlement in Mozambique to Cateme and 25 de Maio is a good example of recognizing and addressing impacts. The case is described at Vale's document available at the BHRRC website.

After this and other cases of resettlement, the company understood that being the involuntary relocation of communities indispensable for the development of some of our activities, it was extremely important to have this process well established and aligned to its Human Rights Policy among its normative documents. For this reason Vale created its Involuntary Relocation Guidelines Norm in 2014 to guide these processes. In addition to this, vale included involuntary relocation into its Community Relations Manual for Capital Projects, its Community Relations Guide and created an Involuntary Relocation Procedure, documents that have been developed in line with international guidelines, particularly those defined by the World Bank and the International Finance Corporation (IFC).

Reference documents:

- BHRRC website (<http://business-humanrights.org/en/brazil-affected-by-vale-launch-report-on-allegations-of-human-rights-abuses-by-the-mining-company-vale-responds#c126822>)

D. PERFORMANCE: COMPANY HUMAN RIGHTS PRACTICES

D.1 EXTRACTIVES

D.3.1. Living wage (in own extractive operations)

Additional Information:

Vale respects legal and mandatory rulings which govern salaries and their adjustments in each locality where the company operates.

In Brazil, the minimum wage is provided by law. Vale also negotiates with labor unions the minimum wages applicable to its employees, which in practice are higher than the legal minimum wage.

Reference documents:

- 2015 Sustainability Report – p 45
(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

D.3.2. Transparency and accountability (in own extractive operations)

We support EITI independently since 2014 and we are part of the EITI Coordinating Committee in Mozambique, Peru and Indonesia.

Reference documents:

- Vale's website (<http://www.vale.com/brasil/en/investors/company/corporate-governance/transparency/pages/default.aspx>)

D.3.3. Freedom of Association and Collective Bargaining (in own extractive operations)

Additional Information:

Vale respects the right to free association and collective bargaining which are rights provided for in Brazilian law. Employees participate in unions that are strong, legitimate and representative in wage bargaining processes and labor agreements

Vale's Code of Ethics and Conduct - "committed to respecting the right of freedom of association and collective bargaining.":

Vale's Human Rights Police cover in "Vale respects the freedom of association and negotiation of its employees and does not interfere in the establishment, operation and administration of labor organizations or collective agreements. Code of Ethics and Conduct also expresses to be intolerable discrimination based on union affiliation.

The percentage of employees considered on collective bargaining agreements is reported annually at the Sustainability Report.

Any kind of discrimination can be reported to the Ethics and Conduct Office, as explained before.

Reference documents:

- Vale's Code of Ethics and Conduct (<http://www.vale.com/en/aboutvale/ethics-and-conduct-office/code-of-ethics/Pages/default.aspx>)
- 2015 Sustainability Report – p 46 (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

D.3.4. Health and Safety: Fatalities, Lost Days, Injury rates

Vale carries out monitoring of H&S strategic indicators in order to verify if the controls and actions in place present the desired effect. Quantitative information is reported annually at the Sustainability Report.

The following actions were taken in 2015 to improve H&S indicators:

- Publication and implementation of the Fatality Prevention Programs, which establish requirements for active and continuous management of situations presenting potential fatality risk of potential for fatalities)
- Establishment of a technical working group for the elaboration of standards related to floor grilles
- Training on safety and prevention for leaders and supervisors
- Content development for the Prevention Week (awareness campaigns for workers)
- Content development for the Reflection Day (annual event that brings together workers worldwide to reflect on work accidents and intensify collective efforts to achieve zero harm)
- Weekly meetings with health and safety teams, focusing on exchange of experiences and organizational learning
- Development and application process for dissemination of good practice, focusing on prevention of fatalities
- Forums for discussion of critical issues with global leaders

- Revision of requirements for Critical Activities (RAC), considering the continuous improvement of this process and including new requirements for prevention
- Acting on health and safety of communities, including the development of operational controls to avoid negative impacts on the health and safety of communities and to promote safer and healthier behaviors of community members
- Acting on the evolution of the company's safety culture through the dissemination of the concept of Genuine Active Care.

Besides, there is strong acting on conducting internal communication actions:

- Weekly global report of incidents with critical/catastrophic severity
- Safety Warnings
- Weekly meetings of H&S teams to discuss potentially critical incidents and lessons learned
- Death notice to all leaders globally when there is a fatal accident
- Local H&S Dialog – weekly meetings to be attended by all employees among its local team to talk about H&S
- 'Learning Together' sessions to discuss new standard procedures for H&S – webinar available to all H&S employees
- Reflection Day – one day dedicated to talk about H&S led by senior executives
- Global Week on Health – one week per year with activities to promote health at all operations
- Accident Prevention Global Week - one week per year with activities to promote prevention of accidents
- Monthly meeting with directors to discuss relevant themes regarding H&S
- Specific corporate e-mail address dedicated exclusively to receive questions regarding H&S from operational teams
- Sharepoint with free access to all employees, where all information regarding H&S can be accessed (Management System, Health, Fatality Prevention, among others)
- Regular meeting with technical specialist to create/review normative documents
- Communication about H&S through existent internal communication channels, focused on sharing good practices and on promote safe behavior

The Board and all Vale's leadership have a bonus related to health and safety which considers the performance on three indicators:

- implementation of the Integrated Management System (HSE)
- implementation of the RAC*
- this one can be chosen from a list of indicators, being one of the options related to community safety

*RAC means critical activities requirements in Portuguese. These activities considered more critical at Vale's operations have very strict procedures and requirements that must be accomplished.

D.3.5. Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations)

Additional Information:

We have defined a set of principles on Indigenous Community relations and have been putting to practice for the last 5 years to make the necessary adjustments and implement it as a Corporate Policy.

Guiding principles

- *Respect for Indigenous Rights and Traditional Communities internationally established , especially self- determination and self-declaration ;*
- *Trust and Mutual Respect of the Rights and Interests*
- *Environmental Responsibility*
- *Sociocultural diversity*
- *Respect for land demarcation*
- *Permanent dialogue*
- *Capacity Building*
- *Sustainability*

Operational guidelines

- *To contribute to the consolidation of indigenous rights*
- *Acknowledging the socio-cultural specificities*
- *Keep qualified staff (all with indigenous relations experience) and training process*
- *Consider the people and communities in all analyzes and strategic decisions of the company*
- *Conduct impact assessments and implementation of mitigation measures*
- *Obtain and maintain the free, prior and informed consultation of indigenous peoples before the start of each phase of the project*
- *Establish agreements and long-term partnerships , building of ethno-development programs*
- *Leverage generation of employment and income, when culturally appropriate (Canada).*
- *Establish or support grievance and demands mechanisms*
- *Monitor and disclose the company's performance in the subject*
- *Participate in the debate of indigenous trends with government institutions and representative indigenous organizations*

• About FPIC (Free Prior and Informed Consultation)

- *Vale holds consultations with indigenous peoples and quilombola communities throughout and in all licensing processes that have Indigenous peoples in the influence area of its projects;*
- *Since we do not operate in indigenous land, the “veto power” does not apply. But free, prior and informed consultation is extensive.*
- *For the licensing process, the work plan , the technical team of the Indigenous Component Studies and the risks/ impact matrix and mitigation plans (PBAs) are discussed and approved by the indigenous communities.*

- *Eg ECI Mother Maria delayed for over a year due to lack of consent of the indigenous people.*
- *Also at mae Maria, Vale paid for anthropologists to support the tribes leaders and communities to understand the Indigenous Component Study*
- *Based on the consultation and consent of the indigenous communities, Mitigation plans are validated by the governmental department responsible for Indigenous Rights (Funai) . Often times, voluntary Agreements between Vale and the indigenous communities are also established*

In Brazil, it is not allowed to mine inside indigenous lands. All licenses that involve projects that have indigenous land in their influence area need an indigenous component study, which is developed in three main phases, these are:

- I. We start the license process doing a Preliminary Study to identify the existence of indigenous people and/or traditional communities in the projects influence area through secondary data review
- II. An anthropologist undertakes a study of the land/tribe, and assesses their environment, looks at the use of natural resources, the tribal history and the likely impacts from the project; they talk and listen to all parts of the community including the elders and the children. Then a risk matrix is developed which is discussed with and validated by the indigenous peoples themselves.
- III. An environmental plan is developed and the indigenous component is included as part of the plan. This plan is then discussed with the communities again and agreed with them. The support is then provided to education; air-, water- and noise- monitoring programmes; animal monitoring; cultural “ethno-development” etc. The idea of this is to not to provide money, but to focus on strengthening the development and independence of the communities and FUNAI.



Vale has professionals with multidisciplinary skills and indigenous relations experience and qualifies employees and suppliers that have interface with indigenous peoples. The company seeks to establish constructive relationship of mutual benefit based on respect for cultural diversity and specific rights, focusing on ethno-development of indigenous peoples and traditional communities in the areas of influence.

To manage the aspects of the relationship with indigenous peoples and traditional communities a planning and management platform was developed in 2015. Among other functions, the platform promotes the monitoring of critical issues, visits and demands; the routine management of interdictions, historical archiving and documents; and monitoring of studies and work plans.

Reference documents:

- Community Relations Guide – internal document
- 2015 Sustainability Report – p. 57, 58, 59 and 60 (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

D.3.6. Land Rights

Additional Information:

As part of company's projects for installation or expansion of its operations, Vale gives priority to alternatives to avoid the compulsory relocation, or involuntary relocation of communities or families from the place where they live. However, due to the precise location of the iron ore deposits, adoption of this procedure may be unavoidable

Vale has a normative for involuntary resettlement whose main objective is to establish general rules for this process, especially for those families and/or people in socioeconomic vulnerability.

Among the main duties, we highlight:

- Search locational or project engineering alternatives to prevent accidental removal vulnerable.
- Seek ways to ensure the participation of individuals and families affected since the beginning of the involuntary removal process through formal instruments.
- Implement social dialogue plan and system for community demands management, focusing on the prevention and resolution of potential conflicts related to the involuntary removal process.
- Respecting public policies, especially housing and use and occupation of the existing soil to the affected territories.
- Identify the people and vulnerable families from the earliest stages of project planning, aiming at incorporating the involuntary removal process on the strategy of access to land and environmental licensing.
- Identify, through technical studies and provide people and families affected the resources needed to maintain or improve their way and standard of living, ensuring mobility and access to public services, livelihoods, economic diversification and income generation.
- Develop the Resettlement Action Plan (RAP) contemplating the necessary measures to mitigate and/or compensate for negative impacts caused by the involuntary removal process, considering the terms of service and applicable social compensation.
- In cases of resettlement, take into consideration for choosing the host area:
 - ✓ The participation of families in the areas of the identification process;
 - ✓ The need of the affected families continue to perform their activities, preferably have better living conditions, infrastructure and services;
 - ✓ The provision of similar or better conditions of water availability, soil fertility, among other attributes.

Vale also has an operational procedure about Involuntary Resettlement, with focus on people/families in socioeconomic vulnerability, that aims to detail the 3 main steps: planning, execution and monitoring (post home moving).

Normative documents related to the involuntary resettlement and land rights acquisition are under review.

Reference documents:

- NFN-0009 - Sustainability Standard – internal document
- PRO 015075 – Involuntary Resettlement Procedure – internal document
- 2015 Sustainability Report – p. 61
(<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

D.3.7 Security (in own extractive operations)

Additional Information:

Our security employees are responsible for assessing on a day-to-day basis the compliance of private security providers to our Policies.

Our human rights due diligence process with respect to private security contractors, doing in house and following our Ethics & Conduct and Human Rights global policies, and in compliance with legislation and other legal aspects, considers the screening in order to find out any evidence of human rights violations, among others (fraud, corruption etc.), globally and periodically. For this process, we have a corporate security team, with more than five employees only dedicated for it, and that interact with our operational security team around the world. Vale reports sustainability indicators since 2007, through its annual Sustainability Report, which follows the Global Reporting Initiative (GRI) guidelines.

“Security teams (employees and contractors): our risk assessment of security requirements includes human rights violations risks. Rigorously select and monitor our employees and contractors, taking into account prior experience, technical skills and emotional stability. Undertake to engage with public security providers assigned to company operations to the greatest possible extent in order to communicate our policy and demonstrate our commitment to respect the civil rights of employees or members of host communities. Educate and train these security professionals to perform activities in accordance with human rights principles, rejecting the abuse of power and degrading and inhumane treatment, assuring non-discrimination and citizens’ privacy. We seek for pacific solutions which ensure the physical integrity of persons, property and information preservation, and production process maintenance.” Since 2008, an average of 3,500 security employees and outsourced workers in this area have been trained every year. In 2015, 2,631 employees and contractors were trained.

Our security teams working locally at our operations are responsible for monitoring contractors of private security forces performance and compliance to Vale’s policies. In 2014, we prepared and organized a training course specifically for company security staff, given their important role in managing contracts with security service providers and the scope for them to act as replicators of company practices. In total, 127 professionals were trained and are capable of replicating the courses for service provider employees, which they do on an annual basis. The selection of employees and contractors for security activities is very rigorous.

Vale seeks to engage with local public security forces and to share its principles on respecting Human Rights. When possible, formal agreements are established.

More information can be founded in item A.1.3.

Vale has a Human Rights Guide, designed to talk about its Human Right Policy in a language adapted to a broader public, especially employees. There as a chapter with guidelines regarding security practices.

The selection of employees and contractors for security activities is very rigorous.

Vale has a team of employees dedicated to security at all units which are responsible to monitor contractors providing security services.

Vale seeks to engage with local public security forces and to share its principles on respecting Human Rights. When possible, formal agreements are established.

Vale´s security teams work closely to the community relations teams to better understand the demands and concerns of communities, and works to prevent and minimize impacts.

Reference:

- Vale Human Rights Guide (Human Rights Guide)
(<http://www.vale.com/EN/aboutvale/sustainability/Documents/human-rights-guide-03-12-2013.pdf>)
- 2016 Sustainability Policy
(http://www.vale.com/pt/suppliers/code_conduct/documents/pol-0019-g%20-%20sustainability%20policy_rev%2000_e.pdf)
- Voluntary Principles on Security and Human Rights
(<http://www.voluntaryprinciples.org/?s=vale>)

D.3.8. Water and sanitation (in own extractive operations)
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Additional Information:

More information is founded in 2015 Sustainability Report - p. 74, 75 and 76

Vale considers the water resources management a strategic issue. Through own guidelines based on existing legal instruments and best practices of engineering and management, the company guides and supports programs that seek to improve their processes from the point of view of water use, reducing water consumption, minimizing the generation of effluents and reuse percentage increase.

The water availability of certain region, even during the initial phase of the licensing process, is identified and analyzed so that the existing weaknesses are mitigated and that the project is designed with consistency - suitable from the point of view of sustainability.

During the licensing process, studies are conducted to help identifying risks related to the project, allowing its mitigation or minimization through socio-environmental plans and programs.

Vale has grants for the right to water use and its collections are carried out in accordance with the legal parameters and conditions of such grants, which ensures the quantitative and qualitative control of water use and the effective exercise of rights of access to water. Thus, we do not impact public sources of water and respect the grants and the conditions of the environmental license.

For decision-making on how Vale will support the improvement of water supply of a community there must be a clear and conclusive analysis to know if the origin of the problem is directly related to the company's activity. The analysis will support internal and external discussions about the effort dedicated for each case.

Anyway, the definition of actions to be taken, being it a legal obligation or not, must consider the following guidelines:

- 1) When possible, actions should be conducted along with the local public government;
- 2) Local legislation must be respected, especially regarding the duty to provide water supply;
- 3) The following actions can be taken individually or together: provision of funds, project design, project execution, provision of permission to capture water inside Vale premises, operational training;
- 4) Provision of funds and project execution must have as reference a project approved by local government with local communities.

Relevant point to be considered for all indicators

Regarding Vale's initiative on expecting its business partners to adopt its commitments on respecting human rights, Vale adopts the mechanisms described below.

Since 2010, in Brazil, the company includes a sustainability clause in contracts with suppliers making it obligatory for suppliers to comply with the Suppliers' Code of Ethics and Conduct and to share the values set out in the Sustainable Development Policy and the Human Rights Policy.

Also to be registered at our supplier database, all companies must sign a commitment term where they agree to:

- accept the principles contained in the Suppliers' Code of Ethics and Conduct;
- strive to comply with the terms and conditions of the Code and to seek to keep in line with it, to develop it and to integrate it into management processes;
- seek to share with Vale and its respective network of suppliers its efforts, difficulties and achievements in incorporating the proposed practices aiming at the sustainability of the company's business

Vale's guidelines for implementing policies, including Vale's Human Rights Policy, in subsidiaries, joint ventures and associate are described at its internal normative document NFN-0001. It is established, concerning Vale's global normative documents, that:

- Unless there is an impediment, wholly owned subsidiaries (100% Vale) may use Vale's normative documents, not being necessary to reproduce them;
- Should be deployed on companies where Vale has majority societal participation, especially those which trade securities / are publicly held, or those which have an influent partner;
- Should be implemented in foundations and associations that have exemption fiscal or that are regulated by any public body;
- Should be deployed on companies where Vale has minority shares participation but the management is made by Vale;
- Other entities where Vale owns shares, in Brazil and abroad, should establish their respective governance models in line with the principles adopted by Vale, respecting the culture and local requirements.

Vale's processes are applied to all its subsidiaries.

Each joint venture or associate has its own governance model. Vale may take part on the managerial decisions, mainly, through its participation on the Board of Directors, and seeks to guarantee alignment to Vale principles, including respect for human rights.

Reference documents:

- Suppliers Code of Conduct (http://www.vale.com/pt/suppliers/code_conduct/documents/codigo-etica-conduta-fornecedor.pdf)
- NFN 0001 – Planning, Development and Management Standard - internal document
- Vale's subsidiaries, joint ventures and associates (<http://www.vale.com/brasil/EN/investors/company/shareholding-structure/subsidiaries-affiliates-joint-ventures/Pages/default.aspx>)
- 2015 Sustainability Report – p. 74, 75 and 76 (<http://www.vale.com/EN/aboutvale/sustainability/links/LinksDownloadsDocuments/2015-Sustainability-report.pdf>)

Summary of Additional Documents

- Submission to CHRB Disclosure Platform;
- Vale's Human Rights Guide;
- 2015 Sustainability Report;
- PDF – email from Voluntary Principles on Security Human Rights
- 2016 Vale's Sustainability Police